REMARKS

Claims 1-13 are pending in the application, and reconsideration and allowance of the application are respectfully requested.

The Office Action does not show that claims 1-4, 11-13 are anticipated by US patent 6,643,701 to Aziz et al. ("Aziz") under 35 USC §102(e). The rejection is respectfully traversed because the Office Action does not show that all the limitations of the claims are taught by Aziz.

Claim 1 sets forth a computer-implemented method for managing respective sessions between mobile communication devices and an application program hosted on a data processing system with a gateway module that is coupled to the mobile communications devices and to the application program. The method comprises generating at the gateway module respective first session identifiers upon receipt of initial requests from the mobile communication devices at the gateway module and transmitting the first session identifiers to the application program; associating the first session identifiers with corresponding second session identifiers from the application program at the gateway module, wherein respective connections are established between the mobile communications devices and the application program; and in response to each subsequent communication from each mobile device to the application program via the connection between the mobile device and the application program while the connection is established, transmitting from the gateway module to the application program the second session identifier that is associated with the first session identifier of the mobile device of the subsequent communication.

Claim 1 clearly sets forth that the gateway module generates respective first session identifiers upon receipt of initial requests from the mobile communication devices at the gateway module and transmits the first session identifiers to the application program. And in response to each subsequent communication from each mobile device to the application program via the connection between the mobile device and the application program while the connection is established, the method transmits from the gateway module to the application program the second session identifier that

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is associated with the first session identifier of the mobile device of the subsequent communication. That is, the second session identifier, which the application provided to the gateway, is transmitted back to the application from the gateway for the subsequent communications.

The Office Action relies on the paper entitled, "The SSL Protocol", Version 3.0, by Freier, Karlton, and Kocher et al. ("Freier-Kocher") in interpreting the teachings of Aziz. Aziz' client-relay-server connection is not shown to operate in the claimed manner, and Freier-Kocher's teachings do not support the assertion that Aziz teaches these limitations. The explicit teachings of the paper clearly demonstrate that Aziz' teachings do not correspond to the claim limitations.

Aziz creates an end-to-end secure transmission link from a client to a relay and from the relay to a server (C 7, L 54-64) using a handshaking session. Freier-Kocher clearly teaches that the server creates session identifiers (P18, P21). Thus, it would appear that Aziz' relay creates a session identifier for use between the relay and the client, and Aziz' server creates another session identifier for use between the server and the client. There is no apparent suggestion by Aziz that a session identifier generated by Aziz' relay in response to a request from a client, is then transmitted to Aziz' server. Nor is it reasonable to conclude from Freier's teachings that Aziz' relay transmits a session identifier that it generated to a server. Thus, the limitations of the gateway module generating respective first session identifiers upon receipt of initial requests from the mobile communication devices at the gateway module and transmitting the first session identifiers to the application program are not shown to be taught by Aziz.

Freier-Kocher's transmission of session identifiers is apparently for resuming a previous session or duplicating an existing session (page 18). Thus, the claimed subsequent communications exclude both the resumption and duplication of a session, and neither Aziz nor Freier-Kocher are shown to teach the claim limitations. The general transmission of session identifiers cited in the Office Action does not teach the specific claim limitations of transmitting from the gateway module to the application program the second session identifier that is associated with the first session identifier of the mobile device of each subsequent communication in response to each

subsequent communication from each mobile device to the application program via the connection between the mobile device and the application program while the connection is established.

Independent claims 4 and 11 include similar limitations and are not shown to be anticipated for at least the reasons set forth above.

Claims 2-4 and 12-13 depend from the independent discussed above and are not shown to be anticipated by Aziz for at least the reasons set forth above.

The rejection of claims 5 and 10 under 35 USC §103(a) over Aziz in view of "Davis" (U.S. Patent No. 6,367,009 to Davis et al.) is respectfully traversed because the Office Action does not show that all the limitations are suggested by the references and does not provide a proper motivation for modifying the teachings of Aziz with teachings of Davis.

Claims 5 and 10 include at least the limitations of independent claims 1 and 4. Thus, the limitations are not shown to be taught by the Aziz-Davis combination for at least the reasons set forth above. The asserted motivation is unsupported by evidence and lacks an explicit reason to combine the teachings. Thus, the asserted motivation is improper. Therefore, the rejection of claims 5 and 10 should be withdrawn because a *prima facie* case of obviousness has not been established.

The Office Action does not establish that claims 6-9 are unpatentable under 35 USC §103(a) over Aziz and Davis, in view of "Sparks" (U.S. Patent No. 6,167,382 to Sparks et al.). The rejection is respectfully traversed because the Office Action does not show that all the limitations are suggested by the references and does not provide a proper motivation for modifying the teachings of Aziz and Davis with teachings of Sparks.

Among other limitations, claim 6 includes limitations of receiving checkout requests from the wireless communication devices at the gateway module and transferring the checkout requests to a wallet module that manages user authentication. The Office Action cites Aziz' FIG. 3 and Sparks' FIGs. 3, 4, 9, 59, 60; col. 2, l. 36-49; and col. 17, l. 12-26. However, there is no apparent element in this portion of Sparks

that corresponds to the gateway module at which checkout requests are received. Nor is there any apparent element that corresponds to the claimed wallet module to which the checkout requests are sent.

Claim 6 depends from claim 5, and claim 7 depends claim 6. Thus, the limitations of claims 6 and 7 are not shown to be suggested for at least the reasons set forth above.

Claim 8 depends from claim 7 and includes the further limitations including: in response to a payment request from a wireless communications device, transmitting the payment request from the gateway module to the merchant application, disassociating the wireless session identifier from the corresponding merchant session identifier, and generating a new wireless session identifier for the wireless communications device when another initial request is received from the wireless communications device. Aziz and Sparks are not shown to suggest these limitations.

The Examiner cites Aziz' general teachings of session resumption procedures as corresponding to these limitations. However, there is no apparent suggestion in either of Aziz or Sparks that any disassociation takes place in response to a payment request as claimed. If the rejection is maintained, Applicant's respectfully request citation to those elements of Aziz and/or Sparks that suggest such as disassociation in response to a payment request.

Claim 9 depends from claim 8 and is not shown to be unpatentable for at least the reasons set forth above.

The rejection of claims 6-9 over the Aziz-Sparks combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination and the asserted motivation is unsupported by evidence and lacks an explicit reason to combine the teachings. Thus, a *prima facie* case of obviousness has not been established.

Claims 1-13 are understood to be patentable under 35 USC §103(a) over "Nguyen" (U.S. Patent No. 5,931,917 to Nguyen et al.) in view of "Davis" (U.S. Patent No. 6,367,009 to Davis et al.). The rejection is respectfully traversed because the Office Action does not show that all the limitations are suggested by the references and

does not provide a proper motivation for modifying the teachings of Nguyen with teachings of Davis.

In claim 1, for example, the claimed functions of the gateway provide that the gateway generates first session identifiers upon receipt of request from the mobile communication devices. Also, at the gateway module the first session identifiers are associated with corresponding second session identifiers from the application program. Further still, the gateway module transmits the second session identifier to the application program in response to each communication from the mobile device having the first session identifier that is associated with the corresponding second session identifier. These limitations are not understood to be suggested by the cited teachings of the Nguyen-Davis combination.

For reference, Nguyen's gateway (FIG. 1B #140; FIG. 18A #1856; FIG. 22, #2240) does not appear to associate identifiers received from the bank host (FIG. 18A #1874; FIG. 20A, #2004) with identifiers for the clients 2000 (FIG. 20C). The claimed gateway associates the first session identifiers generated for the mobile devices with second session identifiers received from the application. Further distinctions are explained below.

Nguyen's payment gateway provides payment authorization to a merchant in response to a request from the merchant as shown by Nguyen's FIG. 3 and described in col. 16, I. 5-17. Also, as shown by Nguyen's FIG. 18A, the gateway 1856 provides an interface between the merchant's VPOS and the bank host. Thus, Nguyen's gateway clearly does not associate identifiers received from the bank host 1874 with identifiers for the clients 2000.

Nguyen's col. 63, I. 32-34, 38-40, FIG. 20B, 20C and col. 65, I. 28-48 are asserted to correspond to the limitations of the step of generating at the gateway module respective first session identifiers upon receipt of initial requests from the mobile communication devices at the gateway module and transmitting the first session identifiers to the application program. However, Nguyen's col. 63, I. 32-34 and 38-40 describes the architecture of FIG. 1B in which the Internet can support communications between a customer and merchant VPOS system. Nguyen's gateway 140 does not receive requests from the communication devices and transmit the identifiers to the

merchant. Rather, Nguyen's merchant receives requests from a customer and requests payment authorization from the payment gateway 140. Also, Nguyen's FIGs. 20B and 20C do not appear to teach the claimed operations of the gateway. Nguyen's col. 65, l. 28-48 teaches that the VPOS communicates a transaction request to the bank. Thus, Nguyen's col. 63, l. 32-34, 38-40, FIG. 20B, 20C and col. 65, l. 28-48 clearly show that his gateway controls communications between a merchant and a bank, not between a mobile device and a merchant application.

Nguyen's col. 19, l. 4-9 and col. 20, l. 10-22 and FIG. 22 are asserted to correspond to the limitations of associating the first session identifiers with corresponding second session identifiers from the application program at the gateway module, wherein respective connections are established between the mobile communications devices and the application program. Based on these cited portions and the portions cited above, Applicant does not understand which elements of Nguyen are asserted to correspond to the claimed first and second session identifiers. Apparently, the Examiner asserts that the terminal identifier of Nguyen's FIG. 20B corresponds to the claimed first session identifier. However, Nguyen's col. 19, l. 4-9 and col. 20, l. 10-22 and FIG. 22 do not appear to suggest any second session identifier that is from the application program. Therefore, the limitations are not shown to be suggested by Nguyen.

Nguyen's col. 19, l. 4-9 and col. 20, l. 10-22 are asserted to correspond to the limitations including: in response to each subsequent communication from each mobile device to the application program via the connection between the mobile device and the application program while the connection is established, transmitting from the gateway module to the application program the second session identifier that is associated with the first session identifier of the mobile device of the subsequent communication. As explained above, the Office Action does not clearly indicate which of Nguyen's elements are thought to correspond to the claimed second session identifier. Furthermore, there is no apparent suggestion that Nguyen's gateway transmits any identifier from the application back to the application for subsequent communications. Since none of Nguyen's elements appear to correspond, the limitations are not shown to be suggested.

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If the rejection is maintained, Applicants respectfully request citations to specific elements of Nguyen that are asserted to correspond to claim limitations. Specifically, Applicants request citation to that element of Nguyen asserted to correspond to the claimed gateway module, that element asserted to correspond to the first session identifiers, that element of Nguyen asserted to correspond to the second session identifier, and that element of Nguyen asserted to transmit the second session identifier to the gateway module element of Nguyen be responsive to each communication from a mobile device.

The asserted motivation for combining Davis with Nguyen is unsupported by evidence and improper. The Office Action asserts that "it would have been obvious ... to recognize the teachings of Davis for mobile computing devices within the teachings of Nguyen for any computing device ... because one of ordinary skill in the art would have been motivated to employ known and useful methods of prior art." The asserted motivation is unsupported by evidence and lacks an explicit reason to combine the teachings. Thus, the asserted motivation is improper.

Claims 2-3 depend from claim 1, independent claim 4 is an apparatus claim that includes functional limitations similar to those of claim 1, independent claim 5 is a method claim that includes limitation similar to those of claim 1, claims 6-9 depend from claim 5, independent claim 10 is an apparatus claim that includes functional limitations similar to those of claim 5, independent claim 11 is a system claim that includes functional limitations similar to those of claim 1, and claims 12-13 depend from claim 11. Thus, the limitations of claims 2-13 are not shown to be suggested by the Nguyen-Davis combination for at least the reasons set forth above.

The rejection of claims 1-13 over the Nguyen-Davis combination should be withdrawn because a *prima facie* case of obviousness has not been established.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above. A petition for a one-month extension of time accompanies this response. No further extension of time is believed to be necessary for consideration of this response. However, if any further extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (HPCO.038PA).

Respectfully submitted,

CRAWFORD MAUNU PLLC
1270 Northland Drive, Suite 390
Saint Paul, MN 55120
(651) 686-6633

By: _____
Name: LeRoy D. Maunu
Reg. No.: 35,274